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May 1, 2020

Re: *Delos Reyes v. Abundant Nursing, Inc. et al*, 19 Civ. 02596 (E.D.N.Y.)
(AMD) (RLM)

Dear Judge Donnelly:

We represent Plaintiff Mark Delos Reyes (“Mr. Delos Reyes” or “Plaintiff”) in the above-captioned action. As directed by Magistrate Judge Mann [ECF No. 47, 52], we write to request that the Court dismiss Defendant MacDonald S. Tudeme (“Defendant Tudeme”) with prejudice via the attached proposed order.

Plaintiff reached and finalized a settlement of his claims against Defendant Tudeme. [ECF No. 41] On April 16, 2020, Magistrate Judge Mann requested a stipulation of dismissal as to Defendant Tudeme to be filed by April 20, 2020 [ECF No. 47], which counsel for Defendant EllenGrace Flores refused to sign. Our detailed reasons for requesting this dismissal are provided in full in our April 20, 2020 letter-motion to Magistrate Judge Mann [ECF No. 48], which is attached for Your Honor’s convenience.

For the reasons set forth above and consistent with Magistrate Judge Mann’s direction, we respectfully request that the Court dismiss Defendant Tudeme under Federal Rule 41(a)(2) with prejudice via the attached proposed order.

We appreciate Your Honor’s consideration and are available to discuss this matter at Your Honor’s convenience.

Respectfully submitted,

/s/ Shefali Singh
Shefali Singh

The Honorable Ann M. Donnelly
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East, Room 4GN
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VIA ECF

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